

Judge: Hon. Marc L. Barreca  
Chapter: Chapter 7  
Hearing Date: June 1, 2012  
Hearing Time: 9:30 a.m.  
Hearing Site: 700 Stewart St, #7106  
Seattle, WA 98101  
Response Date: May 25, 2012

UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:

Case No. 10-19817

ADAM GROSSMAN ,  
Debtor.

**DECLARATION OF KARMA ZAIKE IN  
RELATION TO MOTION TO APPROVE  
SETTLEMENT OF ISSUES RELATING TO  
868 MONTCREST DRIVE, REDDING,  
CALIFORNIA**

Karma L. Zaike, declares under penalty of perjury of the laws of the State of Washington  
as follows:

1. I represent Rabbi Jill I. Borodin in the state Superior Court dissolution  
matter and the matter currently pending in the court of appeals filed by Mr. Grossman. But for  
Mr. Grossman's failure to follow the Court of Appeals' deadlines, the appeal relating to the  
dissolution proceeding would have been decided long ago.

2. Mr. Grossman has filed seven (7) motions requesting continuances, plus  
the appellate court has unilaterally granted several continuances due to Mr. Grossman's failure  
to adhere to the court's timeline. If Mr. Grossman had complied with the court's rules and  
deadlines, the appellate case would likely have been decided months ago.

DECLARATION OF KARMA ZAIKE REPLY TO

OBJECTION TO MOTION TO SETTLE ISSUES  
RELATING TO MONTCREST PROPERTY  
Page 1

**Wood & Jones, P.S.**  
303 N. 67<sup>th</sup> Street  
Seattle WA 98103  
(206) 623-4382

1           3.       Mr. Grossman has not filed a motion in either Superior Court or the Court  
2 of Appeals for a stay from the December 19, 2010 decision and has never posted a bond  
3 pending appeal.

4           4.       Mr. Grossman's appeal is scheduled for "Non-Oral Argument Hearing" on  
5 June 5, 2012. This hearing has no bearing on the date that the court's opinion will be issued. It  
6 could be days, weeks or months. A decision will continue to be delayed if Mr. Grossman  
7 continues filing frivolous motions in that proceeding.

8           5.       Rabbi Borodin has done everything possible to cooperate. She would like  
9 closure in her divorce from Mr. Grossman. The settlement submitted for approval has no  
10 relation to the appeal. In fact, as a result of Mr. Grossman's many delays, there was no certainty  
11 as to when the appellate case would be scheduled for hearing. The court denied many of Mr.  
12 Grossman's motions on April 24 and again on May 11 (see attached rulings). I will not be  
13 surprised if Mr. Grossman continues to take steps to intentionally delay the hearing.  
14

15  
16 I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and  
17 correct.

18  
19 Signed and dated this 29<sup>th</sup> day of May, 2012 in Seattle, WA.

20 

21  
22 \_\_\_\_\_  
23 KARMA L. ZAIKE, WSBA#31037  
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25  
26  
27

28 DECLARATION OF KARMA ZAIKE REPLY TO  
29 OBJECTION TO MOTION TO SETTLE ISSUES  
RELATING TO MONTCREST PROPERTY  
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# EXHIBIT“1”

*The Court of Appeals*  
of the  
*State of Washington*

RICHARD D. JOHNSON,  
*Court Administrator/Clerk*

DIVISION I  
One Union Square  
600 University Street  
Seattle, WA  
98101-4170  
(206) 464-7750  
TDD: (206) 587-5505

April 24, 2012

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CASE #: 66635-5-I  
Adam Reed Grossman, Appellant v. Jill I. Borodin, Respondent

Counsel:

The following notation ruling by Richard D. Johnson, Court Administrator/Clerk of the Court was entered on April 24, 2012:

The appellant, Adam Grossman, has filed a number of motions, the majority of which are essentially the same in substance as motions that he previously filed in this case and that were disposed of by a Notation Ruling dated March 13, 2012.

Grossman's motion to consolidate No. 66053-5, No. 66635-5, No. 67830-2 is essentially the same as his prior motion to consolidate, which was denied. Although he has filed a motion to recall the mandate in No. 66053-5 and had paid the filing fee in No. 67830-2, at the direction of the panel his current motion to consolidate is denied. This case is set for consideration without oral argument on June 5, 2012, and consolidation at this late date would be inappropriate.

Grossman's motion to recall the mandate in No. 66053-3 is denied. Because Grossman's motion to consolidate is denied, there is no reason to recall the mandate in No. 66053-3.

At the direction of the panel, Grossman's motion for leave to file an amended opening brief and his motion for leave to file an over-length amended opening brief not to exceed 180 pages are denied. The Notation Ruling filed March 13, 2012, granted Grossman an extension to April 10, 2012 to file a reply brief. To date, no reply brief has been filed. Instead, Grossman filed this motion for leave to file an amended opening brief and motion for leave to file an over-length amended opening brief not to exceed 180 pages. At the direction of the panel, these motions are denied.

April 24, 2012

CASE #: 66635-5-I

Adam Reed Grossman, Appellant v. Jill I. Borodin, Respondent

Grossman is granted an extension until May 7, 2012 to file a reply brief not to exceed 25 pages in length pursuant to RAP 10.4(b). No further extensions should be anticipated.

Grossman's motion to consider unpublished cases is denied.

Grossman's motion for extension of time for filing the foregoing motions is denied as it is unnecessary.

Now, therefore, at the direction of the panel it is hereby

ORDERED that Grossman's motion to consolidate No. 66053-5, No. 66635-5, and No. 67830-2 is denied; and, it is further

ORDERED that Grossman's motion to recall the mandate in No. 66053-3 is denied; and, it is further

ORDERED that Grossman's motion for leave to file an amended opening brief is denied; and, it is further

ORDERED that Grossman's motion for leave to file an overlength amended opening brief is denied; and, it is further

ORDERED that Grossman's reply brief in No. 66635-5 is due May 7, 2012; and, it is further

ORDERED that Grossman's motion to consider unpublished cases is denied; and, it is further

ORDERED that Grossman's motion for extension of time for filing is denied.

Sincerely,

A handwritten signature in black ink, appearing to read 'R.D. Johnson', with a long horizontal flourish extending to the right.

Richard D. Johnson  
Court Administrator/Clerk

lls

RICHARD D. JOHNSON,  
Court Administrator/Clerk

*The Court of Appeals*  
of the  
*State of Washington*

DIVISION I  
One Union Square  
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May 11, 2012

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CASE #: 66635-5-I

Adam Reed Grossman, Appellant v. Jill I. Borodin, Respondent

Counsel:

Enclosed please find a copy of the order entered by this court in the above case today.

Sincerely,



Richard D. Johnson  
Court Administrator/Clerk

lls

enclosure



**IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON  
DIVISION ONE**

In the Matter of the Marriage of )  
JILL IRINA BORODIN, )  
Respondent, )  
and )  
ADAM REED GROSSMAN, )  
Appellant. )

No. 66635-5-I

ORDER DENYING MOTION  
TO FILE AMICUS CURIAE  
BRIEF

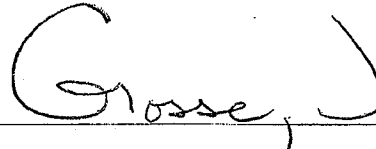
Joanna Strober has filed a motion to file amicus curiae brief in support of the appellant, Adam Grossman. The court has taken the matter under consideration and has determined that the motion should be denied.

Now, therefore, it is hereby

ORDERED that the motion to file amicus curiae brief is denied.

Done this 11<sup>th</sup> day of May, 2012.

FOR THE COURT:

  
\_\_\_\_\_  
Judge

FILED  
COURT OF APPEALS DIV I  
STATE OF WASHINGTON  
2012 MAY 11 AM 8:19



Case 10-19817-MLB Doc 359 Filed 05/29/12 Ent. 05/29/12 15:38:18 Pg. 9 of 9